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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

**KAREEM J. HOWELL,**

Plaintiff,

**v.**

**J. MOKHTAR, F. TROJA, K. CHILDS, S.  
FLOOD, S. WILLIAMSON and J.  
JOHNSON.,**

Defendants.

2:22-cv-00842-WBS-SCR P

**JOINT STIPULATION TO CONTINUE  
THE MOTION TO COMPEL  
DEADLINE; [~~PROPOSED~~] ORDER  
THEREON**

**TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF CALIFORNIA:**

**IT IS HEREBY STIPULATED** by and between the Plaintiff KAREEM J. HOWELL and  
Defendants J. MOKHTAR, F. TROJA, K. CHILDS, S. FLOOD, S. WILLIAMSON, and J.  
JOHNSON (Defendants) (hereafter collectively the “Parties”) that Defendants are granted **sixteen  
(16) additional days** to file a motion to compel further discovery responses.

1 Plaintiff testified on August 21, 2024, that he had additional records responsive to the  
2 discovery propounded by Defendants and would remit them to counsel for Defendants. However,  
3 he does not know when he can remit the records as the property officer at Kern Valley State  
4 Manager has custody of these records. As such, Plaintiff testified and agreed to extend  
5 Defendants' time to file a motion to compel.

6 The Discovery and Scheduling Order sets forth that "[a]ny motions necessary to compel  
7 discovery shall be filed by August 28, 2024." (ECF No. 51 at 6.) However, Defendants' motion  
8 to compel Plaintiff's further responses will be due on or before September 13, 2024, instead of  
9 the present deadline of August 28, 2024.

10 Dated: August 23, 2024

Respectfully submitted,

11 KAREEM J. HOWELL  
12 Plaintiff *Pro Se*

13 /s/ Kareem J. Howell  
14 (as authorized on August 23, 2024 via  
telephone conference)

15 KAREEM J. HOWELL  
16 Plaintiff  
*In Pro Per*

17 Dated: August 23, 2024

Respectfully submitted,

18 ROB BONTA  
19 Attorney General of California  
20 CHAD A. STEGEMAN  
Supervising Deputy Attorney General

21 /s/ Norma Morales  
22 NORMA MORALES  
23 Deputy Attorney General  
24 *Attorneys for Defendants*  
25 *K. Childs, J. Johnson, S. Williamson,*  
26 *F. Troja, and J. Mokhtar*  
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**[PROPOSED] ORDER**

**IT IS HEREBY ORDERED** that Defendants are granted sixteen (16) days to file a motion to compel further responses from Plaintiff. Defendants' motion to compel Plaintiff's further responses will be due on or before September 13, 2024.

**IT IS SO ORDERED.**

DATED: September 6, 2024

  
SEAN C. RIORDAN  
UNITED STATES MAGISTRATE JUDGE